

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.: 5:23CR00500
Plaintiff,) JUDGE CHARLES ESQUE FLEMING
v.)
NATHANIEL L. STURDIVANT,)
MOHAMED SALIM MOHAMED,) <u>UNOPPOSED MOTION FOR</u>
LARRY D. REYNOLDS,) <u>PROTECTIVE ORDER</u>
JAYLAND C. WARE,)
LORENZO L. NETTLES,)
DASHAWN E. DUMAS,)
MARCUS T. WINN,)
Defendants.)

Now comes the United States of America, by and through its counsel, Rebecca C. Lutzko, United States Attorney, and Joseph P. Dangelo, Assistant United States Attorney, and hereby respectfully requests that this Court issue an order pertaining to disclosures made by the United States of America to Defendants. Counsel for the United States has conferred with counsel for all defendants who have been arraigned in the above-captioned case and hereby files this motion unopposed.

The material that the United States intends to provide to Defendants in response to their discovery requests contains several personal identifiers of each Defendant, victims, and cooperating sources. A protective order is necessary to ensure the privacy and safety of each Defendant, victim, and cooperating source. Said material includes recordings of conversations and photographs, among other documents. Much of this discovery contains personal identifying information, including names, social security numbers, dates of births, addresses, telephone

numbers, as well as discloses information that could identify the cooperating sources. Dissemination of this sensitive information would increase the risk of privacy rights being violated and personal safety being threatened. Although the personal identifying information can be redacted manually, such redaction would be a protracted and extend the discovery process.

In the interests of expediting the discovery process and protecting the privacy rights of] the parties involved, the United States respectfully requests that the Court issue the attached proposed protective order pursuant to Federal Rule of Criminal Procedure 16(d)(1).

Respectfully submitted,

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